## Message

From: Lazos, Pamela [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=15D4F11C6327474BB424A24CBD406E93-PLAZOS]

**Sent**: 5/11/2021 3:40:51 PM

To: Rodrigues, Cecil [rodrigues.cecil@epa.gov]; Mastro, Donna [mastro.donna@epa.gov]; Rivera, Nina

[Rivera.Nina@epa.gov]

**Subject**: FW: CRW Matter - Draft Joint Motion for Extension

Attachments: ENV ENFORCEMENT-#2990197-v2-CRW Draft Proposed Order for Motion for Extension of Time.DOCX;

ENV\_ENFORCEMENT-#2990183-v2-CRW\_Draft\_Joint\_Motion\_for\_Extension\_of\_Time.DOCX

Hi guys,

The plan is to file a joint motion (US, PADEP and CRW) for a limited extension of time to answer until May 27<sup>th</sup>. This will allow time for everyone to review the substantive reply brief. We will not filing joint briefs for the actual response, just for the motion for extension of time.

Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

As for the actual response to the motion to intervene, DOJ will send me the draft sometime late Thursday or possibly Friday. Devon wanted to circulate at the staff level first and then revise it before sending it up the chain so you probably won't get it until early next week. Let me know if that's okay or if you'd prefer the more raw version at the end of this week.

Thanks!

From: Ahearn, Devon (ENRD) < Devon. Ahearn@usdoj.gov>

**Sent:** Tuesday, May 11, 2021 11:16 AM

To: Herb, Dawn <dherb@pa.gov>; Williams, Janna <jannwillia@pa.gov>; Andes, Fredric <Fredric.Andes@btlaw.com>
Cc: Levine, Bradley (ENRD) <Bradley.Levine@usdoj.gov>; Lazos, Pamela <Lazos.Pamela@epa.gov>; Nanda, Sushila
<Nanda.Sushila@epa.gov>

Subject: CRW Matter - Draft Joint Motion for Extension

Hi all,

As discussed, I have attached a draft motion for extension of time for briefing the motion to intervene. I have also attached a proposed order. Please let me know if the filings are acceptable. Fred, please also let me know once you've confirmed with the City. I will then seek concurrence from LSRA.

Thanks, Devon

Devon Ahearn Trial Attorney

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